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February 17, 2022

**VIA ECF**

The Honorable Analisa Torres, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Tavarez-Vargas v. Project 7, Inc.*  
Case No. 1:21-cv-10392-AT-GWG

Dear Judge Torres:

We represent defendant Project 7, Inc. in this case. We write, pursuant to Rule I(C) of Your Honor's Individual Practices in Civil Cases and with Plaintiff's counsel's consent, to respectfully request an extension of time for Project 7 to answer, move, or otherwise respond to the Complaint and an extension of time for the parties to submit their joint letter and joint proposed Case Management Plan.

We are still in the process of conferring with Plaintiff's counsel regarding a potential resolution, which would obviate the need for further intervention by the Court. Discussions between counsel continued as recently as yesterday. Project 7's response to the complaint is presently due February 17, 2022, and the parties' joint letter and joint proposed Case Management Plan are presently due February 25, 2022. We respectfully request an extension of thirty (30) days to March 21, 2022 for Project 7 to respond to the Complaint and an attendant extension to March 28, 2022 for the parties to submit their joint letter and joint proposed Case Management Plan to allow time for the parties to continue and hopefully complete their ongoing discussions and so as to not jeopardize the progress they have made thus far. This represents Project 7's third request for an extension of its time to respond to the Complaint and its second request for an extension of time for the parties to submit their joint letter and joint proposed Case Management Plan. The prior requests, also upon consent, were granted. The requested extensions will not affect any other scheduled date.

Hon. Analisa Torres, U.S.D.J.  
U.S. District Court, S.D.N.Y.  
February 17, 2022  
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We appreciate the Court's attention to this matter and are available at the Court's convenience should it have any questions.

Respectfully Submitted,

GORDON REES  
SCULLY MANSUKHANI, LLP

/s/ David J. Grech

David J. Grech

GRANTED.

SO ORDERED.

Dated: February 22, 2022  
New York, New York



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ANALISA TORRES  
United States District Judge